

## **Exhibit D**

### **McCollum Declaration**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**ARTHUR L. LEWIS, JR., et al.,**  
Plaintiffs,

v.

**CITY OF CHICAGO,**  
Defendant.

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Case No. **1:98-cv-5596**

Judge: **Hon. Joan B. Gottschall**

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**DECLARATION OF PATRICK L. MCCOLLUM**


I, Patrick L. McCollum, declare as follows:

1. I am over the age of 18, competent to testify, and a member of the shortfall group hired pursuant to this Court's August 17, 2011, Injunctive Order.
2. I was hired by the Chicago Fire Department on March 16, 2012, as part of the shortfall group.
3. I have personal knowledge of the facts stated in this declaration.
4. I participated in the 2016 Fire Engineer promotional examination, announced around September 16, 2016, and administered November 14, 2016. The initial eligibility list was released in May 2018, and the final list in August 2018.
5. I participated in the 2019 Fire Lieutenant promotional examination, announced in September 2019 and administered December 15, 2019.
6. For the 2016 Fire Engineer promotion, my seniority points were limited to 16.9 out of 30, reducing my maximum cumulative score to 86.9 out of 100.
7. My rank on the 2016 Fire Engineer Final Eligibility List was 261. With full seniority points, my rank would have been within the top 30, a reduction of approximately 230 positions due to the limitation.
8. For the 2019 Fire Lieutenant exam, my seniority points were reduced by approximately 2.2 points, lowering my rank by about 50 positions on the 2019 eligibility list.
9. I have lost the following promotional opportunities due to the City's ongoing effects of racial discrimination and the limitations on seniority points:

- a. 2001 Engineer Exam
- b. 2007 Engineer Exam
- c. 2009 Fire Lieutenant Exam
- d. 2017 Captain Exam
- e. 2019 Battalion Chief Exam
- f. 2022 Battalion Chief Exam

10. CFD members hired in the earliest Firefighter candidate classes from the 1995 CFD entry were eligible to take the 1999 Fire Lieutenant Promotional exam, an opportunity lost to shortfall group members.
11. I am aware that Rodney Shelton contacted Hughes, Socol, Piers, Resnick, and Dym in February 2019 to request representation for these issues.
12. Attorney Matthew Piers responded on March 4, 2019, stating: "We are not in a position to provide you with assistance in this matter, and if you wish to pursue it, you should retain other counsel."
13. I believe appointment of new class counsel is necessary to protect the interests of the shortfall group regarding these promotion-related issues.
14. I request that Attorneys Chiquita Hall-Jackson, S. Todd Yeary, Kevin Mahoney, and Rodney Diggs be appointed as substitute class counsel for the shortfall group pursuant to Federal Rule of Civil Procedure 23(g).

I declare under penalty of perjury that the foregoing is true and correct.

DocuSigned by:  
  
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Patrick L. McCollum  
 Member of the Lewis Class

5/2/2025

Date